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DAX PIERSON

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA

19 DAX PIERSON,

20 Plaintiff,

21 vs.

22 FORD MOTOR COMPANY,

23 Defendant.

) Case No. CV-06-06503 PJH

) **JOINT MOTION AND STIPULATION TO**
) **STAY JUDGMENT; [PROPOSED] ORDER**

24
25
26 Plaintiff Dax Pierson and Defendant Ford Motor Company have met and conferred with
27 respect to staying the judgment and execution or enforcement thereof, pending conclusion of post-
28 trial and appellate proceedings in this matter. Although Fed. R. Civ. Proc. Rule 62(a)'s 10 day stay

1 after entry of judgment falls on September 1, 2009, Parties have agreed that Ford may post its bond
2 of \$15,227,000, by September 4, 2009. The judgment and execution or enforcement thereof are
3 stayed until the conclusion of post-trial and appellate proceedings in this matter, as if Ford's bond
4 was approved by this Court before September 1, 2009.

5
6 Date: August 25, 2009

Respectfully Submitted,

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8 SHOOK, HARDY & BACON, L.L.P.

9 By: /s/ H. Grant Law
10 H. GRANT LAW
11 Attorney for Defendant
12 FORD MOTOR COMPANY

13
14 THE BRANDI LAW FIRM.

15 By: /s/ Kevin F. Quinn
16 KEVIN F. QUINN,
17 Attorney for Plaintiff
18 DAX PIERSON

19
20 **[PROPOSED] ORDER**

21 Pursuant to stipulation, the Court hereby orders the following:

22 Enforcement or execution of the judgment in this matter are hereby stayed pending
23 conclusion of post-trial and appellate proceedings, subject to Ford posting its bond by September 4,
24 2009.

25 **IT IS SO ORDERED.**

26 DATED: 8/26/09

